

United States District Court

United States District Court
Southern District of Texas
FILED

JUN 17 2008

SOUTHERN

DISTRICT OF TEXAS

Michael N. Milby, Clerk

UNITED STATES OF AMERICA

V.

1) LOPEZ-Camarillo, Ramiro
Mexican Citizen - 1973

2) TORRES-Elizondo, Hugo Silver
Mexican Citizen - 1980

(Name and Address of Defendant)

3); 4) Attached

CRIMINAL COMPLAINT

CASE NUMBER:

M-08-3966-M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or June 16, 2008 in Hidalgo County, in the Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and intentionally conspire and possess with the intent to distribute more than 50 kgs. of methamphetamine, that is approx. 95.8 kgs. of methamphetamine, a Schedule II controlled substance, knowingly and intentionally Possess With the Intent to Distribute less than 50 kgs. of Heroin, that is approx. 8.4 kgs. of Heroin, a Schedule II Controlled Substance, knowingly and intentionally Possess With the Intent to Distribute less than 50 kgs. of cocaine, that is approx. 13 kgs. of cocaine, a Schedule II Controlled Substance. in violation of Title 21 United States Code, Section(s) 841(a)(1), 846

I further state that I am a(n) Task Force Officer and that this complaint is based on the following Official Title

facts:

See Attachment.

Continued on the attached sheet and made a part

Yes No


TFO Charles E. Trevino
Signature of Complainant

Sworn to before me, and subscribed in my presence,

June 17, 2008

Date

Dorina Ramos, U.S. Magistrate Judge
Name and Title of Judicial Officer

at McAllen, Texas
City and State


Signature of Judicial

United States District Court

United States District Court
Southern District of Texas
FILED

SOUTHERN

DISTRICT OF TEXAS

JUN 17 2008

UNITED STATES OF AMERICA
v.

Michael N. Milby, Clerk

3) LOPEZ-Morales, Victor Ivan
Mexican Citizen - 1983

CRIMINAL COMPLAINT

4) HINOJOSA-Moreno, Victor Manuel
Mexican Citizen - 1958
(Name and Address of Defendant)

CASE NUMBER:

M-08-3946-M

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or June 16, 2008 in Hidalgo County, in the

Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and intentionally conspire and possess with the intent to distribute more than 50 kgs. of methamphetamine, that is approx. 95.8 kgs. of methamphetamine, a Schedule I controlled substance, knowingly and intentionally Possess With the Intent to Distribute less than 50 kgs. of Heroin, that is approx. 8.4 kgs. of Heroin, a Schedule I Controlled Substance, knowingly and intentionally Possess With the Intent to Distribute less than 50 kgs. of cocaine, that is approx. 13 kgs. of cocaine, a Schedule II Controlled Substance. in violation of Title 21 United States Code, Section(s) 841(a)(1), 846

I further state that I am a(n) Task Force Officer and that this complaint is based on the following Official Title

facts:

See Attachment.

Continued on the attached sheet and made a part



AUSA

Sworn to before me, and subscribed in my presence,

June 17, 2008

Date

Yes No


TFO Charles E. Trevino

Signature of Complainant

at McAllen, Texas
City and State

Dorina Ramos, U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial

ATTACHMENT

On 06/15/2008, at approximately 2244 hrs, McAllen Police responded to 3621 W. Bluebird Avenue, McAllen, Texas in reference to a burglary of habitation in progress. Upon arrival, police made contact with the residents identified as Jorge Alberto VELASQUEZ and Claudia Denise LUNA. Upon police arrival, the suspects had already fled the scene. During the investigation, VELASQUEZ claimed that an armed suspect broke down the front door to the residence and gained entry. VELASQUEZ claimed that the armed suspect fired shots inside the home and then fled the scene. VELASQUEZ was very uncooperative with police and refused to provide further information on the incident and refused to provide further description on the suspect(s).

Upon inspecting the home/property for evidence, police discovered approximately 60 pounds of marijuana, a semi automatic handgun, and approximately \$12,680.00 US currency. VELASQUEZ was also found to be an undocumented Mexican national in the U.S. illegally. McAllen Police subsequently arrested VELASQUEZ on state charges for Possession of Marijuana.

Further investigation at the crime scene (3621 W. Bluebird) revealed a home rental contract for a residence located at 4904 W. Walnut Avenue, McAllen, Texas. The person renting the home listed on the contract was under the name of Hugo Silver TORRES-Elizondo.

Police subsequently set surveillance at 4904 W. Walnut Avenue, McAllen, Texas and observed a white Nissan Pathfinder Armada displaying temporary license plates and a brown Chevy Impala displaying Texas license plate 257-WZL parked in front of the residence. A short time later during surveillance, Agents observed a white Nissan Maxima displaying Tamaulipas-Mexico license plate XCV-92-68 exit the garage and drive away from the residence. A McAllen police marked unit subsequently conducted a traffic stop on the white Nissan Maxima for a traffic violation (failure to signal lane change) at the 3800 block W. Pecan Avenue, McAllen, Texas.

McAllen Police Special Investigations Unit (SIU) Investigator Raul Garza approached the scene of the traffic stop and made contact with the driver, identified as Victor Ivan LOPEZ-Morales. Investigator Garza explained to LOPEZ that an investigation was being conducted and asked LOPEZ where he was coming from. LOPEZ told Investigator Garza that he was coming from his aunt's residence located on Vine Avenue and 38th Street (McAllen, Texas). Investigator Garza then explained to LOPEZ that he was observed during surveillance leaving the garage at 4904 W. Walnut Avenue. At that time LOPEZ became very nervous and admitted to Investigator Garza that he did in fact leave the residence at 4904 W. Walnut Avenue. Investigator Garza then asked LOPEZ if there was contraband inside the residence. LOPEZ then voluntarily admitted to Investigator Garza that there was a large quantity of illegal drugs inside the residence at 4904 W. Walnut Avenue, McAllen, Texas and further stated that there were three (3) males inside the residence. LOPEZ was detained at that time pending further investigation.

During surveillance at 4904 W. Walnut, police observed a male subject, later identified as Victor Manuel HINOJOSA-Moreno, exit the residence and approach the Chevy Impala.

McAllen Police and US DEA Agents subsequently approached the residence at 4904 W. Walnut Avenue, McAllen, Texas and made contact with HINOJOSA. HINOJOSA was asked by police if he was the resident of the home. HINOJOSA told police that he did reside at the residence but was not the renter. HINOJOSA stated that the renter of the home was named Hugo and was inside the residence.

Police then knocked on the door and made contact with the resident, identified as Hugo Silver TORRES-Elizondo. TORRES voluntarily admitted to police that he was renting the residence and paid utilities at that location. Police informed TORRES that a drug investigation was being conducted and asked TORRES for consent to search his residence. TORRES then voluntarily signed a written consent form and gave police consent to search his residence.

During the search, police detained another male inside the residence. The male was identified as Ramiro LOPEZ-Camarillo.

A further search of the home revealed several bundles containing approximately 95.8 kilograms of methamphetamine, approximately 8.4 kilograms of heroin, and 13 kilograms of cocaine inside the residence. Also discovered inside the residence was approximately 5.3 ounces of marijuana and a loaded 9mm Luger semi automatic handgun. (Note: The bundles of narcotics were discovered in several locations inside the residence such as the kitchen cabinets, hallway storage cabinets and S/W bedroom closet. The semi automatic handgun was located lying on top of a mattress that was on the living room floor. The marijuana was discovered in plain view scattered on a table in the nook area of the home).

Victor Ivan LOPEZ-Morales, Victor Manuel HINOJOSA-Moreno, Hugo Silver TORRES-Elizondo and Ramiro LOPEZ-Camarillo were all subsequently arrested and were transported to the DEA McAllen District Office for interrogation.

Prior to interrogation, all the suspects were advised of their Miranda warnings and all voluntarily waived their Miranda rights.

During interrogation, Victor Ivan LOPEZ-Morales, Hugo Silver TORRES-Elizondo and Ramiro LOPEZ-Camarillo all admitted to Agents that they were residing at the residence (4904 W. Walnut Avenue) and had knowledge illegal narcotics were being stored inside the residence. They all admitted that they occasionally took small amounts of cocaine from the stored bundles and consumed the cocaine. They also admitted that they assisted in removing bundles of narcotics from load vehicles that would arrive at the residence for and would store the bundles inside the residence. They also admitted that they were being paid US currency for their services at the residence. They further admitted that

they had knowledge of the handgun that was in the living room of the residence and stated that the handgun was for protecting the narcotics.

During interrogation Victor Ivan LOPEZ-Morales, Hugo Silver TORRES-Elizondo and Ramiro LOPEZ-Camarillo also admitted to Agents that Victor Manuel HINOJOSA-Moreno was residing at the residence, had knowledge that illegal narcotics were being stored inside the residence, consumed cocaine that was removed from the stored bundles, handled bundles of narcotics as they were being delivered to the residence, and had knowledge/access to the handgun that was in the living room.

During interrogation, Victor Manuel HINOJOSA-Moreno denied involvement in drug trafficking activities and denied knowledge of the narcotics and handgun that were located inside the residence at 4904 W. Walnut Avenue. (Note: During the investigation it was revealed that HINOJOSA had an apartment located at 6800 N. 8th St. Apt. B, McAllen, Texas. A consensual search of HINOJOSA's apartment revealed a small plastic baggie containing 10 grams of methamphetamine and approximately \$3,500.00 US currency in the master bedroom closet. HINOJOSA told Agents that he lived alone at the apartment. Also during booking procedures at the McAllen Police Department, jailers discovered a small plastic baggie containing .7 grams of cocaine and a small crack cocaine rock weighing 0.1 grams inside HINOJOSA's pant front pocket.

Victor Ivan LOPEZ-Morales, Victor Manuel HINOJOSA-Moreno, Hugo Silver TORRES-Elizondo and Ramiro LOPEZ-Camarillo were all subsequently arrested on federal drug charges.